links 2 as a link mechanism, but is <u>not</u> composed of these three elements and it is <u>not</u> located in each type of equipment. For example, the Gastouniotis et al. '329 data gathering device 4 (equipment meter) does not have those three elements, and it cannot transmit an interrogation signal (act as a client). Instead, the data gathering device can transmit only a responding signal (act as a server). Thus, applicants' claims 1-10 distinguish patentably over Gastouniotis et al. '329. A more detailed explanation follows:

Claim 1, second subparagraph, recites the link mechanism being present in each type of automatic control equipment. Gastouniotis et al. '329 does <u>not</u> disclose equipment having these necessary dual roles because the instrument link 2 has no such capability, and data gathering device 4 merely responds to interrogation by remote station 6, without having the additional role of being able to query it.

Claim 1, last subparagraph, recites:

wherein the link mechanism comprises:

a detection means for detecting presence of at least one server automatic control equipment;

This arrangement is found in Fig. 3, showing the communication sequence described in the specification beginning at page 11, first paragraph, summarized here as the link mechanism sending query 11 by "client" automatic control equipment 20'; detecting query 11 and then sending a detection response 21 by "server" automatic control equipment 20.

Claim 1 further recites:

a description means for querying identification of the detected server automatic control equipment; and

This arrangement also is shown in Fig. 3: sending description query 12 by "client" automatic control equipment 20'; detecting query 12 and sending a description response 22 by "server" automatic control equipment 20.

Claim 1 also recites:

a service means for communicating with the identified server automatic control equipment.

This means is shown in Fig. 3: sending service query 13 by "client" automatic control equipment 20'; detecting query 13 and sending a services 23 response by "server" automatic control equipment 20.

According to the second subparagraph of claim 1, each equipment must include the recited detection means, description means and service means. Applicants' link mechanism having the above functionality is located in all of the equipment, which is not the case in Gastouniotis et al. '329. Gastouniotis et al. '329, column 4, lines 9-14, describes:

remotely located instrument reading units or instrument links 2, each associated with a data gathering device 4 or instrument such as a utility meter. Each instrument link includes a self powered receiver 44 and transmitter means 30 (see Fig. 2.).

Gastouniotis et al. '329, column 4, lines 15-45, describes remote station 6 interrogating instrument link 2, with data being transmitted from each data link, but the patent describes none of the other units, such as the remotely located data gathering devices 4, also having such interrogating function using link 2. Instead, devices 4 merely respond to interrogation by sending data output. This operation is contrary to the operations of the device of applicants' claim 1. Gastouniotis et al. '329, column 4, lines 46-54, describes station 6 sending a signal to each instrument link 2 to obtain data gathered by data gathering unit 4, which responds by

sending a data signal. Thus, station 6 acts as a "client" by sending an interrogation signal, and unit 4 acts as a "server" and responds by sending a data signal. Gastouniotis et al. '329 does not disclose a reverse operation, i.e., data gathering unit 4 being able to initiate a communication, i.e., act as a "client" and interrogate anything.

Accordingly, Gastouniotis et al. '329 does <u>not</u> disclose a link mechanism located in <u>each</u> equipment, such link mechanism including (1) a detection means for detecting presence of at least one server, (2) a description means for querying identification of the detected server, and (3) a service means for communicating with the identified server, as recited in applicants' claim 1.

All claims 1-10 are now proper in form and patentably distinguished over all grounds of rejection stated in the Office Action. Accordingly, allowance of all claims 1-10 is respectfully requested.

Should the Examiner deem that any further action by the applicants would be desirable to place this application in even better condition for issue, the Examiner is requested to telephone applicants' undersigned representatives.

Respectfully submitted,

PARKHURST & WENDEL, L.L.P.

January 6, 2005

Date

Charles A. Wendel

Registration No. 24,453

Robert N. Wieland

Registration No. 40,225

CAW: RNW/mhs

Attorney Docket No.: SCHN:002

PARKHURST & WENDEL, L.L.P. 1421 Prince Street, Suite 210 Alexandria, Virginia 22314-2805

Telephone: (703) 739-0220